

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PANKAJ SHARMA,

Plaintiff,

v.

VIVIAN LIU

Defendant.

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Civil Action No. 20-20268

Declaration of Samuel B. Fineman

Electronically Filed

I, SAMUEL B. FINEMAN, declare as follows:

1. I am an attorney at law of the State of New Jersey and a partner with the law firm of Cohen Fineman, attorney for Plaintiff, Pankaj Sharma, in the above captioned matter. I submit this declaration in support of Plaintiff's Motion to Seal the Record of this matter.

2. All documents attached hereto are true and accurate copies of the originals.

3. Plaintiff seeks to seal the following documents attached hereto as Exhibit 1.

4. The declarant relies on the Declaration of Plaintiff Pankaj Sharma in support of this Motion to Seal.

5. Plaintiff's Motion to Seal rests on the assertions that (1) the facts contained in the pleadings are private in nature and the public does not benefit from their public dissemination or observation; and, (2) that Plaintiff will be prejudiced and will suffer serious injury to his reputation, career, and livelihood if the Court does not enforce the Order that the record submitted herewith be sealed from the public.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: May 21, 2023

/s/ Samuel B. Fineman

Samuel B. Fineman, Esquire

NJ Bar ID: 005381999

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EXHIBIT 1

- 1) Notice of Removal (12/23/2020)
- 2) Letter (1/7/2021)
- 3) Motion to Dismiss/Lack of Jurisdiction (1/20/2021)
- 4) Amended Complaint (2/11/2021)
- 5) Motion to Dismiss/Lack of Prosecution (3/3/2021)
- 6) Memorandum in Opposition of Motion (3/24/2021)
- 7) Letter (3/31/2021)
- 8) Response in Support of Motion (4/7/2021)
- 9) Letter (10/19/21)
- 10) Motion for Order to Show Cause (10/25/2021)
- 11) Letter (10/28/2021)
- 12) Order on Motion to Dismiss/Lack of Jurisdiction (10/29/2021)
- 13) Motion for Extension of Time to File an Answer (11/9/2021)
- 14) Order (11/12/2021)
- 15) Answer to Amended Complaint (12/12/2021)
- 16) Motion for Order to Show Cause (2/24/2022)
- 17) Order (5/17/2022)
- 18) Declaration (5/17/2022)
- 19) Motion to Continue (7/18/2022)
- 20) Letter (8/25/2022)